

The Law Firm

Fleming . Ruvoldt PLLC

Harold J. Ruvoldt  
hruvoldt@flemingruvoldt.com  
(201) 518-7866 (direct)

15 Engle Street  
Suite 100  
Englewood, NJ 07631  
(201) 518-7878

800 Third Avenue, 28<sup>th</sup> floor  
New York, NY 10022  
(212) 600-9537  
Fax: (973) 860-1874

January 15, 2020

Via ECF

The Honorable Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Dan Zhong  
Criminal Docket No. 16-614 (AMD)  
(Development Group of NYP, LLC)

Dear Judge Donnelly:

We represent Development Group of NYP, LLC. On December 23, 2019, Your Honor entered a Scheduling Order (by docket entry) for our Petition with regard to the forfeiture of 304 Fifth Avenue. Pursuant to that Order, on Friday, January 10, 2020, the U.S. Government filed a response to our Petition. Your Order provides us seven days (to January 17, 2020) to respond.

It is our intention to file a response, however, lead counsel Cathy Fleming had an unfortunate death in her family yesterday. As a result, we had a conversation with AUSA Brian Morris in which he consented to an extension until Friday, January 24, 2020, for us to file a response.

We respectfully request that the Court grant us until Friday, January 24, 2020, to file a response to the Government's filing.

Respectfully submitted,

/s/Harold J. Ruvoldt  
Harold J. Ruvoldt

cc: AUSA Brian D. Morris